



**{In Archive} Re: Fw: definition of PCBs relating to paint** 📎

**Amy Hensley** to: vanderwoude.ats

Cc: Vernon Myers, Molly Finn

05/05/2008 03:24 PM

Archive:

This message is being viewed in an archive.

Mr. VanderWoude,

Paint that contains PCBs from its manufacture (not from a spill) is regulated for disposal as PCB bulk product waste if it is at > 50 ppm "at the time of designation for disposal" (40 CFR 761.3). Therefore, from what you describe, your paint at 6.3 ppm and below is not regulated for disposal (assuming the PCBs are not from a spill).

Please let me know if you have any questions.

Regards,  
Amy

Amy Hensley  
Corrective Action Programs Branch  
Permits and State Programs Division  
Office of Solid Waste  
U.S. EPA  
703-305-5084

-----Forwarded by Vernon Myers/DC/USEPA/US on 05/03/2008 02:56PM -----

To: Vernon Myers/DC/USEPA/US@EPA  
From: "Steve VanderWoude" <vanderwoude.ats@verizon.net>  
Date: 05/02/2008 11:39AM  
Subject: definition of pcbs relating to paint

Dear Mr. Myers, I left a message on your phone line, but maybe this is easier for you. I was referred to you by Steven at the TSCA hotline. I am an environmental consultant and I have a client in Westchester County, New York. They are upgrading a facility and have found that they have PCBs in the paint. The levels range from 590-6300 micrograms per Kilogram. My understanding, after reading EPA website information, is that these paints would not be regulated PCBs because the concentrations are .590-6.30 parts per million. Micrograms per Kilogram are equal to parts per billion. Am I correct? Thank you very much. Steve VanderWoude (914) 774 8253 or office (914) 654 0080 or email, whichever is easiest for you. Thanks again